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JAN 17 2017

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

**CLERK, U.S. DISTRICT COURT
ANCHORAGE, AK.**

JUSTIN RICHARD GILMORE,
PLAINTIFF

VS.

Case No. 3:16-cv-00214-TMB

CORNERSTONE CREDIT SERVICES,
L.L.C.
DEFENDANT

GILMORE'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES.

TO THE HONORABLE JUDGE OF THIS COURT;

The Plaintiff, Justin Richard Gilmore, asks the court to order Defendant, Cornerstone Credit Services, L.L.C. to answer questions 3 and 7 of Gilmore's First Set of Interrogatories. Gilmore also requests for the court to sanction Defendant for his obstructive and dilatory tactics used in responding to Interrogatories and states as follows:

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INTRODUCTION

1. In attempting to coordinate a time that would be acceptable to complete the 26f scheduling report, Gilmore demanded that a confidentiality agreement be in place prior to discovery.(Exhibit A) Cornerstone refused on multiple fronts to comply with Gilmore's demands stating excuses like "there are no matters of attorney client privilege" and that a confidentiality agreement would be "unnecessary". (Exhibit B) Gilmore also informed counsel of what he intended to obtain in discovery only to be ignored when he asked counsel if he would like to reconsider his position regarding the confidentiality agreement.
2. Upon receiving Cornerstone's responses to interrogatories, (Exhibit C) Gilmore found dilatory and obstructive responses to questions 3 and 7. Gilmore, in good faith, conferred with counsel to obtain proper responses without court intervention. Counsel refused to comply and should be sanctioned for his practices.

REQUESTED RELIEF

3. Gilmore requests that Cornerstone be ordered to provide proper responses to Gilmore's interrogatories and future discovery. Gilmore also requests that a protective order be in place to curb further obstructive discovery responses. Gilmore requests the court to impose sanctions for failing to respond to discovery under rule 37.

Dated: January 13, 2017

Respectfully submitted



Signature

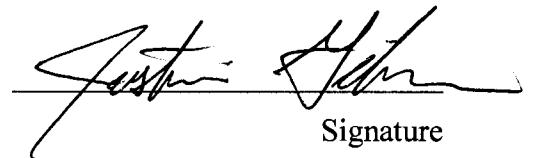
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Declaration Under Penalty of Perjury

I, Justin Richard Gilmore, declare under penalty of perjury, that I have reviewed the above motion, and that the information contained in this motion is true and correct.

DATED: January 13, 2017, at Anchorage, Alaska.



The image shows a handwritten signature in black ink, consisting of two parts: "Justin" and "Richard". The signature is fluid and cursive, with a horizontal line underneath it.

Signature

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CERTIFICATE OF SERVICE

I certify that I have served the above motion via U.S. first class mail to Brian D Heady 2600 Denali Street Anchorage AK, 99503 on January 13, 2017

A handwritten signature in black ink, appearing to read "Justin Richard Gilmore". The signature is fluid and cursive, with a horizontal line drawn through it at the end.

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